

THE HONORABLE BARBARA J. ROTHSTEIN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JEFFREY HILL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

LES SCHWAB TIRE CENTERS OF
WASHINGTON, LLC, a Washington limited
liability company; and DOES 1-20,

Defendants.

No. 2:24-CV-00425-BJR

**JOINT STIPULATED MOTION
AND ORDER TO EXTEND TIME
TO RESPOND**

I. STIPULATION

1. Plaintiff Jeffrey Hill filed a Class Action Complaint for Damages, Injunctive Relief, and Declaratory Relief (“Complaint”) on March 7, 2024, in Washington State Superior Court for King County.

2. Plaintiff served a copy of the Complaint on Les Schwab Tire Centers of Washington, LLC (“Defendant”) on March 8, 2024.

3. Defendant removed this matter to this Court on March 28, 2024, and filed a Motion to Dismiss, or in the Alternative Strike the Class Allegations on April 4, 2024. Dkt. ##1, 10.

4. On April 8, 2024, this case was reassigned to this Court. *See generally* Dkt. On April 9, 2024, the Court entered a Minute Order striking Defendant’s Motion to Dismiss, which

**JOINT MOTION AND ORDER EXTENDING
TIME TO RESPOND – 1 (2:24-CV-00425-BJR)**

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

1 was filed prior to reassignment of the case and issuance of the Court's standing order, with leave
2 to refile pursuant to the standing order. Dkt. #16.

3 5. On April 19, 2024, Defendant refiled its Motion to Dismiss, or in the Alternative
4 Strike the Class Allegations. Dkt. #17.

5 6. On April 29, 2024, Plaintiff filed a Motion to Remand. Dkt. #20

6 7. Pursuant to the Court's Standing Order, the parties have the following motion
7 deadlines:

8 a. Defendant's Motion to Dismiss

9 i. Plaintiff's Opposition – May 10, 2024

10 ii. Defendant's Reply – May 24, 2024

11 b. Plaintiff's Motion to Remand

12 i. Defendant's Opposition – May 20, 2024

13 ii. Plaintiff's Reply – June 3, 2024

14 8. The parties conferred by email on April 30, 2024, and May 1, 2024, and agreed to
15 stipulate and ask the Court for an order setting a joint briefing schedule of the pending motions, as
16 requested below.

17 9. Good cause supports this joint motion. Plaintiff and Defendant agree that a joint
18 briefing schedule conserves the resources of the parties and places both issues before the Court on
19 the same timeframe.

20 10. The parties, therefore, request that the Court enter an order setting a briefing
21 schedule as follows:

22 a. Defendant's Motion to Dismiss

23 i. Plaintiff's Opposition – June 3, 2024

24 ii. Defendant's Reply – June 17, 2024

25 b. Plaintiff's Motion to Remand

26 i. Defendant's Opposition – June 3, 2024

ii. Plaintiff's Reply – June 17, 2024

11. No other dates or deadlines would be altered by this proposed extension of time.

12. The Parties do not anticipate moving for further extensions of the aforementioned deadlines.

RESPECTFULLY SUBMITTED this 3rd day of May 2024.

EMERY | REDDY, PLLC

By: s/ Timothy W. Emery

Timothy W. Emery, WSBA No. 34078
Patrick B. Reddy, WSBA No. 34092
Paul Cipriani, WSBA No. 59991
600 Stewart Street, Suite 1100
Seattle, WA 98101
Telephone: +1.206.442.9106
Facsimile: +1.206.359.9000
emeryt@emeryreddy.com
reddyp@emeryreddy.com
paul@emeryreddy.com

Attorneys for Plaintiff Jeffrey Hill

PERKINS COIE LLP

By: s/Emily A. Bushaw

Charles N. Eberhardt, Bar No. 18019
Emily A. Bushaw, Bar No. 41693
Kyle D. Nelson, Bar No. 49981
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000
CEberhardt@perkinscoie.com
EBushaw@perkinscoie.com
KyleNelson@perkinscoie.com

Attorneys for Les Schwab

II. ORDER

Based on the foregoing stipulation, IT IS ORDERED that the motion deadlines are amended as follows:

	Current Deadline	New Deadline
Response to Defendant's Motion to Dismiss, Dkt. #17	May 10, 2024	June 3, 2024
Reply in Support of Defendant's Motion to Dismiss, Dkt. #17	May 24, 2024	June 17, 2024
Response to Plaintiff's Motion to Remand, Dkt. #20	May 20, 2024	June 3, 2024
Reply in Support of Defendants' Motion to Remand, Dkt. #20	June 3, 2024	June 17, 2024

DATED this 6th day of May 2024.



BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE

1 ***Presented by:***

2 **PERKINS COIE LLP**

3 By: *s/ Emily A. Bushaw*

4 Charles N. Eberhardt, Bar No. 18019

5 Emily A. Bushaw, Bar No. 41693

6 Kyle D. Nelson, Bar No. 49981

7 1201 Third Avenue, Suite 4900

8 Seattle, Washington 98101-3099

9 Telephone: +1.206.359.8000

Facsimile: +1.206.359.9000

CEberhardt@perkinscoie.com

EBushaw@perkinscoie.com

KyleNelson@perkinscoie.com

10 **EMERY | REDDY, PLLC**

11 By: *s/ Timothy W. Emery*

12 Timothy W. Emery, WSBA No. 34078

13 Patrick B. Reddy, WSBA No. 34092

14 Paul Cipriani, WSBA No. 59991

15 600 Stewart Street, Suite 1100

16 Seattle, WA 98101

17 Telephone: +1.206.442.9106

18 Facsimile: +1.206.359.9000

19 emeryt@emeryreddy.com

20 reddyp@emeryreddy.com

21 paul@emeryreddy.com

22
23
24
25
26
JOINT MOTION AND ORDER EXTENDING
TIME TO RESPOND – 5 (2:24-CV-00425-BJR)

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on May 3, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: May 3, 2024

s/ Kyle D. Nelson

Kyle D. Nelson